

1
2
3
4
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

5
6
7
8
9
10
SHAWN MACKEY PLAINTIFF
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

V. CIVIL ACTION NO. 3:23-CV-233-DPJ-ASH
JOHN PIGOTT, ET AL. DEFENDANTS

ORAL DEPOSITION OF PEGGY DIANNE SMITH WATSON

Taken at the instance of the Plaintiff on Friday,
September 20, 2024, in the Office of the Mississippi
Attorney General, 550 High Street,
11th Floor, Jackson, Mississippi,
beginning at 1:16 p.m.

(Appearances noted herein)

REPORTED BY: Kelly D. Brentz, CSR-MS, CSR-TX, RPR
AW Reporting, LLC
338 Indian Gate Circle
Ridgeland, Mississippi 39157
kelly@awreporting.com
601-573-0961

1 A. I think I was there, but I don't -- I don't
2 remember discussion about Kell. I honestly don't.

3 Q. (By Ms. Ross) Did y'all vote that day?

4 A. I don't remember.

5 Q. If the minutes reflect that there was a
6 unanimous vote that day, the day that Andrea Mayfield
7 resigned, would you dispute the minutes?

8 A. No, I wouldn't dispute minutes. Missy is good
9 at those.

10 Q. And what was the basis for your vote for Kell to
11 be the interim director on that day?

12 A. Peacemaker.

13 Q. Anything else?

14 A. Gentle spirit, peacemaker, staff liked him,
15 presidents liked him. We needed healing from Andrea's
16 mess.

17 Q. You mentioned that one of the cons -- you
18 mentioned that one of the cons with Mackey was his
19 relationship with certain staff members. Do you recall
20 that?

21 A. Yes, ma'am.

22 Q. And what staff members?

23 A. Not calling names.

24 Q. Huh?

25 A. I'm not calling names.

1 members who agreed with you that Jana -- they liked Jana
2 better than Steve or were you the only one?

3 A. I don't think so. I think they -- when I
4 gave -- you know, when I ticked off why I liked her, they
5 were like, yeah, those are all good, but -- and then
6 they -- they really liked him. Maybe the businessman
7 part -- and she did have less -- she was just a nurse. I
8 don't know, I just liked her personality. She had a
9 really, really, really, really good personality so --
10 okay, so back up. What was your question?

11 Q. I was asking for the pros on Kell and the cons.

12 A. Again, for the -- for the issues we were having
13 because of Dr. Mayfield and her problems -- I wasn't there
14 when she started. They acted like she did really, really
15 good when she first got there. But it kind of went
16 downhill, but I know she was dealing with a lot with her
17 husband.

18 But, anyway, things got fractured, like I had in
19 my notes. I just think Kell was the man to fix the
20 problems that she'd created. He had a really good
21 relationship with the presidents. He had a really good
22 relationship with the legislature. He had a really good
23 relationship with the staff.

24 Q. And how do you know about Kell's relationship
25 with the staff?